

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Jennifer D. Thomas

Debtor

Bankruptcy No. 17-11962  
Judge Jacqueline P. Cox  
Chapter: 13

**NOTICE OF FILING**

TO: Jennifer D. Thomas, 5415 West Ohio, Chicago, IL 60644  
Tom Vaughn, 55 E. Monroe Street, Suite 3850, Chicago, IL 60603  
Rae Kaplan, 25 East Washington St., Suite 1501, Chicago, IL 60602  
Patrick S Layng, Office of the U.S. Trustee, Region 11, 219 S Dearborn St, Room 873,  
Chicago, IL 60604

Please take notice on July 14, 2017, the attached Objection to Confirmation of was electronically filed with the Clerk of the Bankruptcy Court for the Northern District of Illinois.

**CERTIFICATE OF SERVICE**

I, Anna E. Rinehart, an attorney certify that I served the attached Objection to Confirmation by mailing a copy to the Debtor at the address listed above by depositing the same in the U.S. mail, first class, postage prepaid at 230 W. Monroe St., Chicago, IL 60606 on or before 5:00 p.m. on July 14, 2017. The remaining parties were served by the CM/ECF electronic noticing system.

/s/ Anna E. Rinehart

Anna E. Rinehart, ARDC #6321383  
Attorney for DLJ Mortgage Capital, Inc.

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**NOTICE:**

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION  
OBTAINED WILL BE USED FOR THAT PURPOSE

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**OBJECTION TO CONFIRMATION**

NOW COMES DLJ Mortgage Capital, Inc. through its attorney, Anna Rinehart of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on April 17, 2017.
2. The Movant, a party in interest, holds a Mortgage dated August 26, 1998 on the property located at 5415 W. Ohio Street, Chicago, Illinois 60644, in the original amount of \$89,600.00.
3. The Debtor's plan provides that the Chapter 13 Trustee pay the Movant \$0.00 for its arrearage claim.
4. As of July 14, 2017, Movant has not yet filed its Proof of Claim, but intends to do so before the claims bar date.
5. Presently, Movant is in the process of preparing its Proof of Claim and estimates the arrearage to be in the amount of \$1,556.02.
6. By not paying the full amount of Movant's claim, the proposed plan modifies the rights of the Movant and such modification is inconsistent with the provisions of 11 U.S.C. 1322(b)(2) and as such, the plan does not comply with the Bankruptcy Code.

WHEREFORE, DLJ Mortgage Capital, Inc. prays that confirmation of the Debtor's plan be denied and for such other relief as the Court deems just.

/s/ Anna E. Rinehart

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